



February 14, 2005

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: WT Docket 94-102

Dear Ms. Dortch:

I am writing this letter on behalf of my agency, West Suburban Consolidated Dispatch Center (WSCDC), in support of the recent supplemental filing by the Association of Public-Safety Communications Officials-International, Inc. reference the "Request for Declaratory Ruling" filed October 6, 2004. WSCDC is a multi-jurisdictional multi-agency 9-1-1 Emergency Communications Center for three suburbs, Oak Park, River Forest and Elmwood Park, on the western border of Chicago.

We have been receiving wireless 9-1-1 calls for our area since we began operations as a consolidated center on May 2, 2002. Shortly afterwards we transitioned to handling Phase II data for six of our seven carriers and will finally finish the transition of T-Mobile to Phase II later this month. From the beginning we sold the idea of consolidation on the increased benefits to the citizens one of which was the ability to receive wireless 9-1-1 calls using the latest technology and locating the callers with Phase II accuracy.

When we began receiving wireless calls we made every carrier test every site and every sector. When we requested Phase II service we again required that every sector on every site that we were receiving calls from be tested. During the drive testing we compared the location information between our mapping program and the tester's data. When we found a problem with a sector, the carrier was required to implement a repair and then retest.

Our communities made the commitment to employ the latest technology that would allow us to locate our citizens at times of their most urgent needs. This equipment was very expensive, but we felt the cost would be justified to meet the expectations of the public who are generally of the impression that we know exactly where they are when they dial 9-1-1 whether it is from their home or from their car.

Illinois is a very large state with huge variations in population density. To base the accuracy requirements for wireless 9-1-1 over the entire state will negatively impact the areas with the highest call volume and the greatest dependency on wireless access for emergency services. If we don't require the carriers to determine their accuracy in our highly urbanized and populated areas at the PSAP level, we will be compromising our ability to find our citizens when they need it the most. It also means the expense we incurred to purchase the technology to meet the FCC accuracy guidelines to be excessive.

Sincerely,

Gregory T. Riddle  
Executive Director

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cc: Edward Thomas  
John Muleta